

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO.: 04- 11572 JLT

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SUSAN COONEY, )  
Plaintiff, )  
 )  
v. )  
 )  
SAYBROOK GRADUATE SCHOOL )  
AND RESEARCH CENTER, )  
Defendant. )  
)

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**DEFENDANT, SAYBROOK GRADUATE SCHOOL AND RESEARCH CENTER'S  
MOTION FOR ADDITIONAL QUESTIONS TO PROSPECTIVE JURORS**

Defendant, Saybrook Graduate and Research Center ("Saybrook"), respectfully requests that the Court, in accordance with Fed. R. Civ. P. 47(a), to submit the following additional questions to person called as jurors in this case:

1. Have you or any member of your immediate family or close friend ever been a plaintiff in civil case?
2. Have you or any member of your immediate family or close friend ever been involved in a lawsuit with a business?
3. Have you or any member of your immediate family or close friend ever thought you were wronged by a business or company and have seriously contemplated suing that business or company?
4. Do you have any bias or prejudice against colleges, universities, schools which would prevent you from rendering a decision free from passion or prejudice?
5. Do you have any bias or prejudice against "distance learning schools" which would prevent you from rendering a decision free from passion or prejudice?

6. What is the highest level of education you have received?

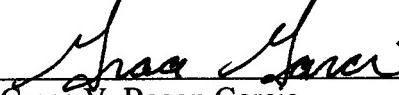
Defendant further requests that the Court examine each person called as a juror out of the presence of the other prospective jurors. As grounds for this request, the defendant states that prospective jurors may hesitate to answer fully the necessary questions out of fear, anxiety, or embarrassment and that individual examination of jurors in these areas is necessary to assemble a jury which can reach a fair and impartial decision.

Defendant,  
Saybrook Graduate and Research Center  
By its attorneys,

  
Thomas C. Federico, BBO# 160830  
Grace V. Bacon Garcia, BBO# 640970  
Morrison Mahoney LLP  
250 Summer Street  
Boston, MA 02210-1181  
(617) 439-7500

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on March 19, 2007.

  
Grace V. Bacon Garcia